United States Environmental Protection Agency

Region 2

Statement of Work

Site Assessment Team (SAT) Contract

TABLE OF CONTENTS

I. INTRODUCTION

- A. BACKGROUND
- B. PURPOSE
- C. SCOPE

II. TECHNICAL REQUIREMENTS

A. CERCLA ASSESSMENT ACTIVITIES

- 1. Preliminary Assessments
- 2. Site Inspections
- 3. Combined Preliminary Assessment/Site Inspection
- 4. Site Inspection Prioritization
- 5. Federal Facility PA/SI Review
- 6. Integrated Assessments
- 7. Expanded Site Inspection/Remedial Investigation (ESI/RI)
- 8. Brownfields Assessments
- 9. Expanded Site Inspections
- 10. Remedial Investigation/Feasibility Study
- 11. Hazard Ranking System/National Priorities List Packages
- 12. Enforcement Support

B. TECHNICAL SUPPORT ACTIVITIES

- 1. General Technical Support
- 2. Public Participation Support
- 3. Site Discovery Programs
- 4. Assessment of Human Health and Ecological Risks

C. DATA MANAGEMENT SUPPORT

D. QUALITY ASSURANCE REQUIREMENTS

I. INTRODUCTION

A. BACKGROUND

The Site Assessment Team (SAT) contractor shall provide professional and technical support services to the Environmental Protection Agency (EPA) to support EPA in the assessment of contaminated or potentially contaminated sites, including Brownfields. Brownfields are abandoned, idled, or under-used industrial and commercial facilities where expansion or redevelopment is complicated by real or perceived environmental contamination.

The current site assessment process consists of the evaluation and the placement of sites on the EPA National Priorities List (NPL) which is commonly called the Superfund list. After a site has been identified through the site discovery process, the site is prioritized by EPA and an initial evaluation is done via a preliminary assessment (PA). A PA is an initial screening of the site in which all available data (e.g., past industrial activity, permit history, location of drinking water intakes) are collected and reviewed. If warranted by the PA, a site inspection (SI) is conducted. A SI involves on-site work that usually includes collection and analysis of suspected contaminated soil, surface water, groundwater, and air samples. In some cases, integrated assessments (IAs), which combine activities of the PA, SI, and removal assessment, are conducted at sites where there is the potential for both short-term and long term response actions.

If warranted by the SI or IA, the site is formally evaluated for listing using a Hazard Ranking System (HRS) package. To determine an HRS score, all of the data gathered in the PA/SI stages are analyzed using the HRS. The HRS package results in the documentation of the Agency's rationale, data, scoring procedures, overall score, and references—are prepared by the States, EPA regions, and other participants in the NPL process, and are submitted through the regional EPA offices to the Office of Emergency and Remedial Response (OERR). The OERR NPL coordinator for each EPA region reviews each initial submission of a site package to ensure that basic quality control standards are met. Sites with an HRS score of 28.5 or greater are eligible for proposal to the NPL. The HRS packages proposed to the NPL are placed in the Superfund docket for public review when the proposed rule is published in the Federal Register.

Technical support provided under this contract may be performed at privately owned sites or federal facilities, as specified by work assignment or technical direction letter.

B. PURPOSE

The purpose of this statement of work (SOW) is to provide advisory and assistance services to Federal officials responsible for the activities described in the background.

C. SCOPE

The contracting officer will issue work assignments for all work required under this SOW in accordance with the terms and conditions of the contract. The contractor shall submit all analyses, options, recommendations, reports, and any other work products in draft form for review by the contracting officer or the contracting officer's representative (COR) prior to use or distribution. The Government will make all final regulatory, policy and interpretative decisions resulting from contractor-provided advice and assistance provided under this SOW as well as all final decisions regarding compliance determinations or the existence or violations of an order, law, regulation, etc. The contractor will not provide any legal advice or legal interpretations. When conducting training, seminars and presentations, the contractor shall not interpret EPA policy or regulations and any questions about EPA policy and regulations shall be referred to EPA. The contractor shall not publish or otherwise release, use, or disclose any work product generated under this SOW without obtaining EPA's express written approval. When submitting reports or documents that contain recommendations, the contractor shall:

- 1. explain or rank policy or action alternatives
- 2. describe procedures used to arrive at recommendations
- **3.** summarize the substance of deliberations
- 4. report any dissenting views
- 5. list sources relied upon
- 6. detail the methods and considerations upon which the recommendations are based

II. TECHNICAL REQUIREMENTS

Technical requirements under this SOW include assessment; enforcement; technical support; and data management, as discussed below.

A. CERCLA ASSESSMENT ACTIVITIES

The task list below addresses the generic assessment tasks which may be ordered through work assignments and task orders in support of Sections II.A.1. through II.A.11. More specific requirements follow the generic list for:

Preliminary Assessments
Site Inspections
Combined Preliminary Assessment/Site Inspection
Site Inspection Prioritization
Federal Facility PA/SI Reviews
Integrated Assessments

Brownfield Site Investigations
Expanded Site Inspections
Expanded Site Inspections/Remedial Investigations
Remedial Investigation/Feasibility Studies
Hazard Ranking System/National Priorities List Packages
Enforcement Support

Assessment Task List

More specifically, the contractor shall:

- 1. locate and review files of waste generator(s)/site owner(s)/site operator(s) and other documents relating to past operator(s), (for example, deeds, court transcripts);
- 2. locate and review files of state and local authorities, other federal agencies, and interested parties;
- 3. using COR-approved protocols, interview site owner(s)/operator(s), state/local officials, residents, and other interested parties;
- 4. provide a written record of Potentially Responsible Party (PRP) identification efforts to assist EPA in determining cost liability;
- 5. conduct off-site perimeter visual observation of the site;
- 6. assist EPA in obtaining site access
- 7. using COR-approved protocols, conduct an on-site reconnaissance to document site conditions; with written and visual documentation (for example., 35mm camera and/or [VCR] or 8 mm video camcorder, sketches, logbook description, or digital camera);
- 8. provide recommendations and options regarding:
 - whether an immediate threat to public health or the environment exists
 - potential need for a removal action
 - further investigation
 - no further action
 - state referral
 - referral to other federal agencies
 - referral to other EPA programs
 - facility actions
 - other actions;
- 9. identify site characteristics (for example, populations, sensitive environments, site usage, hydro geological and meteorological conditions, and other pertinent site conditions);
- 10. identify pollutant dispersal pathways;
- 11. identify extent of contamination;
- 12. develop a health and safety plan for field activities which complies with Office of Safety and Health Administration (OSHA) and local health and safety requirements;
- 13. develop and submit a preliminary findings sampling plan (See Section H) for field activities to ensure the usability of the data for assessment purposes;
- 14. conduct both on-site and/or off-site environmental sampling activities;
- 15. provide analytical services to include:

- Contract Laboratory Program (CLP) (via sample coordinator)
- non-CLP (including EPA regional laboratory and regional analytical services contracts),
- field screening,
- mobile laboratories;
- 16. identify and address data gaps required to meet EPA assessment objectives (for example, background levels, applicable or relevant and appropriate requirements (ARARs), groundwater information);
- 17. install monitoring wells and/or piezometer;
- 18. perform air monitoring;
- 19. perform analytical data validation;
- 20. conduct geophysical surveys/investigations;
- 21. generate preliminary HRS score;
- 22. analyze site risks regarding whether site contaminants pose a current or potential risk to human health and the environment in the absence of any response action to include:
 - contaminant identification
 - exposure assessment
 - toxicity assessment
 - risk characterization
 - provide information necessary to determine whether or not a response is necessary at the site, provide justification for any response action proposed, and explain what exposure pathways need to be addressed;
- 23. provide a hazard ranking system screening in accordance with EPA OSWER Directive 9345.1-07 (November 1992), "The Hazard Ranking System (HRS) Guidance Manual" using the PREScore software or subsequent software;
- 24. report the draft score to the EPA COR prior to proceeding with the formal HRS package;
- 25. prepare a draft HRS package to include:
 - site summary
 - PREScore HRS score sheets
 - documentation record
 - figures
 - maps
 - references;
- 26. dispose of investigation derived wastes, in accordance with EPA guidance (Managing Investigation Derived Wastes for Site Inspections Office of Solid Waste and Emergency Response [OSWER] Directive 9345.3-02);
- 27. provide cost analysis/information for response alternatives;
- 28. provide site security to prevent unauthorized access of any persons or animals to preserve public safety. Site security may include, for example, fencing, or armed or unarmed security services;
- 29. identify contamination or potential contamination associated with illegal drug labs, explosions, or spills;

- 30. complete and maintain documentation of all contractor actions taken or assigned consistent with the NCP for cost recovery purposes. Make available to federal trustees of affected natural resources information and documentation to assist the trustees in the determination of actual or potential natural resource injuries. Documentation shall provide:
 - the source and circumstances of the release
 - the identity of responsible parties
 - the response action taken
 - an accounting of contractor costs incurred in support of EPA response actions
 - the impacts and potential impacts to the public health and welfare and the environment;
- 31. locate and review existing site, facility and/or release data;
- 32. identify potentially responsible parties (PRP)(s);
- 33. analyze PRP documents and actions for compliance with enforcement actions;
- 34. analyze the accuracy, timeliness and completeness of PRP reports;
- 35. document PRP activities and provide negotiation support;
- 36. provide health indication sampling and analysis, for example blood, urine, and hair samples;
- 37. provide site communications (for example, radios, repeaters, commercially available radio systems, telephones, pagers);
- 38. perform nuclear/biological/chemical sampling and analysis;
- 39. conduct human indicator sampling;
- 40. provide engineering design products and services.

1. Preliminary Assessments (PA)

The contractor shall perform PA activities, in conformance with:

OSWER Directive 9345.0-01A, "Guidance for Performing Preliminary Assessments Under CERCLA", dated September 1991; and,

Region-specific requirements, available in Region's library.

More specifically, the contractor shall:

- review past and present facility waste handling practices and permit history document the presence, quantity, type, or absence of uncontained or uncontrolled hazardous substances on site, and releases to the environment
- identify pollution dispersal pathways; determine pathway-specific receptors and surrounding population density
- locate other environmentally sensitive receptors (as per Table 4-23 in 40 CFR300, Hazard Ranking System Final Rule)

2. Site Inspections

The purpose of the SI is to incorporate and build upon the objectives of a PA, and may require the collection of samples or the evaluation of existing analytical data to evaluate site conditions. The contractor shall perform SI activities in conformance with:

EPA/540-R-92-021, "Guidance for Performing Site Inspections Under CERCLA", dated September 1992; and,

Region specific requirements, available in Region's library.

More specifically the contractor shall:

- identify releases that pose no significant threat to public health or the environment
- analyze the potential need for removal action
- collect or develop data for the COR to evaluate the release pursuant to the HRS
- collect data required for the COR to better characterize the release for more effective and rapid initiation of the remedial investigation/feasibility Study (RI/FS) or response

3. Combined PA/SI

As ordered, the contractor shall perform preliminary search and field activities outlined in the PA and SI sections above into one effort.

4. Site Inspection Prioritization (SIP)

The purpose of the SIP -- an intermediate step in the site assessment program to update old SIs (for example, SIs completed prior to the revision to the HRS) on a discrete universe of sites-- is to gather any additional information necessary to help set priorities among sites assessed under the old HRS scoring system. The contractor shall perform SIP activities in accordance with:

OSWER Directive 9345.1-15FS "Site Inspection Prioritization Guidance" (August 1993), as amended, and

Region-specific requirements, available in the Region's library

More specifically, the contractor shall:

- update or revise the HRS Score
- identify data gaps
- perform desktop data collection to support the revised score
- perform sampling (data collection)

5. Federal Facility PA/SI Review

The contractor shall assist EPA in the implementation of its oversight role during the site assessment process at facilities owned and/or operated by other Federal agencies. A Federal Facility PA/SI Review (FF PA/SI)(Complete the Region II Federal Facility Review Form) does not require any type of site reconnaissance or sampling on the part of the contractor; it only involves a review of an HRS-oriented checklist and supporting information supplied by the Federal Agency which owns the site (In some cases, non-sampling data must be gathered by the contractor to fill data gaps on which the Federal Agency is unable or unwilling to provide information.)

The contractor shall perform Federal Facility PA/SI Reviews in conformance with the following:

"Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. Section 9620), Section 120(h) as amended and the Federal Facility Compliance Act of 1992 (as amended); and OSWER Directive 9345.0-01 Checklist"

6. Integrated Assessments (IA)

The purpose of an IA is to gather data that meets the requirements of both a removal site evaluation and remedial site inspection at the same site. The data gathering effort may require field screening and full CLP analysis of samples. The contractor shall perform the relevant tasks described in the Assessment Task List in conformance with the following:

"Integrating Removal and Remedial Site Assessment Investigations", OSWER Short Sheet 9345.16FS, September 1993;

Removal Site Evaluation and Site Inspection documents referenced above; and

Region specific guidance, available in the regional library

7. Expanded Site Inspection/Remedial Investigation (ESI/RI)

The integration of site assessment activities to expedite the Superfund remedial process is a major focus of the Superfund Accelerated Cleanup Model (SACM). An integrated ESI/RI under SACM can expedite site characterization while a site is evaluated under rule making to be placed on the National Priorities List (NPL).

This task provides specific requirements for the integrated ESI/RI report that differ from a traditional RI. The major differences between the ESI/RI and a traditional RI are that the RI portion of this task will not determine the full nature and extent of the contamination at the site, and will not complete a baseline risk assessment.

The ESI/RI is intended to serve a twofold purpose:

- a. provide additional information required to support preparation of an HRS package for NPL listing
- b. further characterize a site beyond Pre-remedial site assessment by initiating a phased RI.

The RI planning and sampling activities, as well as risk assessment shall fall within the scope of CERCLA site assessment activities. The integrated ESI/RI report must include the traditional ESI report, the HRS documentation package, a qualitative human health risk assessment, and the early phase(s) of an RI report based on the work completed under the work assignment.

In performing an ESI/RI, the contractor shall:

- a. determine the nature of potential ground water contamination and possibly soil exposure concerns (e.g., delineate source(s) of contamination) as required by the HRS
- b. determinine an estimated extent of contamination at a portion of the site to provide adequate data for a qualitative human health risk assessment
- c. collect adequate data for a cost estimate for completing the traditional RI/FS, including a baseline risk assessment.

The contractor shall perform the following ESI/RI activities in accordance with the following applicable regulations:

- 1) Expanded Site Inspection Transitional Guidance For Fiscal Year 1988 OSWER Directive 9345.1-02
- 2) Hazardous Ranking System Guidance Manual OSWER Directive 9345.1-07

- 3) Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA OSWER Directive 9355.3-01, 10-88
- 4) Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA August 1993 EPA-540-R-93-051

8. Brownfield Site Investigations (BSI)

The Brownfields are abandoned, idled or underutilized industrial and commercial facilities. The purpose of the Brownfield assessment is to streamline site investigation and to characterize site conditions. The BSI will not involve collection of data associated with HRS package preparation. The objectives of a BSI are to identify:

- the nature and extent of contamination on-site
- the risks posed by the contamination
- potential alternatives for cleanup
- costs of cleanup options for site redevelopment

The contractor shall perform a BSI in conformance with the following:

"Integrating Brownfields and Traditional Site Assessment", #9230.0-81, EPA 540-F-96-028, January 1997;

"Guidance for Performing Site Inspections Under CERCLA" EPA 540-R-92-021, September 1992;

"Road Map to Understanding Innovative Technology Options for Brownfields Investigation and Cleanup", EPA 542-B-97-002;

Region specific requirements, available in Region's library; Brownfields Quality Assurance document (EPA 540-R-98-038);

Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", ASTM, E 1527-9; and "Environmental Site Assessments: Phase II Environmental Site Assessment

9. Expanded Site Inspections (ESI)

The purpose of the Expanded Site Inspections (ESI) is to provide the additional information required to support preparation of an HRS package for NPL listing and often involves the installation of monitoring wells. The contractor shall perform the relevant tasks for an ESI as described in the Assessment Task List in conformance with the following:

EPA 540-R-92-021, "Guidance for Performing Site Inspections Under CERCLA", dated September 1992; and

Region-specific requirements, available in Region's library

10. Remedial Investigation/Feasibility Study (RI/FS)

An RI/FS is an extensive assessment conducted at sites which are proposed/added to the NPL. The purpose of an RI/FS is to develop the data necessary to support the selection of a remedy to eliminate, reduce, or control risks to human health and the environment. The contractor shall perform the relevant RI/FS tasks described in the Assessment Task List in conformance with the following:

"EPA Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final", U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01.

11. Hazard Ranking System/National Priorities List Packages (HRS/NPL)

The contractor shall perform the relevant HRS/NPL tasks described in the Assessment Task List in conformance with the following:

EPA OSWER Directive 9345.1-07, November 1992, "The Hazard Ranking System Guidance Manual"

12. Enforcement Support

The contractor shall perform the relevant enforcement support activities described in the Assessment Task List.

B. TECHNICAL SUPPORT ACTIVITIES

The list below addresses the technical support activities which may be ordered through work assignments or task orders. More specific requirements follow the generic list.

The contractor shall provide information, analyses, options and recommendations for implementing emerging technologies and maintaining program currency.

- 1. General Technical Support
- 2. Public Participation Support
- 3. Site Discovery Programs
- 4. Assessment of Human Health and Ecological Risks

1. General Technical Support

- a. identify, analyze and recommend for implementation emerging technologies
- b. provide information, analysis, recommendations and options for maintaining program currency and program improvements.

2. Public Participation Support

The contractor shall perform public participation tasks to ensure that public and private interests are kept informed of response events and activities and that all parties' concerns are considered throughout the process.

The contractor shall perform public participation tasks in conformance with:

"Community Relations in Superfund: A Handbook", January 1992; and

"Public Participation Guidance for On-Scene Coordinators: Community Relations and the Administrative Record", OSWER Directive 9360-05, June 1992

3. Site Discovery Programs

The Contractor shall perform the following tasks in order for EPA to determine whether sites require additional site assessment activities. The contractor shall: collect, record, and analyze information on location and type of uncontrolled hazardous substance disposal sites, facilities and/or releases to isolate potential candidates for further site assessment.

4. Human Health/Ecological Risk Assessment

The contractor shall perform the risk assessments in accordance with the following guidance:

For Baseline Human Health Risk Assessments:

Risk Assessment Guidance for Superfund (RAGS), Volume I: Human Health Evaluation Manual:

- Part A, Baseline Risk Assessment. Interim Final. December 1989. EPA 540/1-89/002. NTIS PB90-155581.
- Part B, Development of Risk-Based Preliminary Remediation Goals. December, 1991. EPA 540/R-92/003. OSWER Directive 9285.7-01B. NTIS PB92-963333.
- Part C, Risk Evaluation of Remedial Alternatives. December 1991. EPA/540/R-92/004.OSWER Directive 9285,701C. NTIS PB92-963334.
- Part D, Standardized Planning, Reporting and Review of Superfund Risk Assessments. January 1998. EPA 540-R-97-033. OSWER Directive 9285.7-01D. NTIS PB97-963305;

Supplemental Guidance to RAGS: Calculating the Concentration Term. June 22, 1992. OSWER Directive 9285.7-081;

Standard Default Exposure Factors. Interim Final. OSWER Directive 9285.6-03. March 25, 1991;

Final Guidance Data Usability in Risk Assessment (Part A). April 1992. OSWER Directive 9285.7-09A. NTIS PB92-963356;

Guidance for Data Usability in Risk Assessment (Part B). May 1992. OSWER Directive 9285.7-09B. NTIS PB92-963362;

Dermal Exposure Assessment: Principles and Applications. January 1992. EPA 600/8-91/011B;

Exposure Factors Handbook, Volume 1.1997. EPA/600/P-95/002Fa;

Exposure Factors Handbook, Volume 2.1997. EPA/600/P-95/002Fb;

Exposure Factors Handbook, Volume 2.1997. EPA/600/P-95/002Fc;

Air/Superfund National Technical Guidance Study Series, Volumes I, II, III, and IV (EPA 450/1-89-001,002,003,004, July 1989);

Final Soil Screening Guidance, May 17, 1996. Soil Screening Guidance User's Guide. Office of Solid Waste and Emergency Response. EPA/540/R-96/018;

Soil Screening Guidance: Technical Background Document. EPA 540/R-94/126;

EPA Risk Characterization Program. Memorandum from Administrator Carol Browner. Office of the Administrator, Washington, DC. March 21, 1995;

Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons. Office of Research and Development, Washington, DC. EPA/600/R-93/C89;

PCBs: Cancer Dose-Response Assessment and Application to Environmental Mixtures. Office of Research and Development, Washington, DC. EPA/600/P-96/001A;

Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities. July 14, 1994. OSWER Directive 9355.4-12.

For Baseline Ecological Risk Assessments:

Guidelines for Ecological Risk Assessment, Final. April 1998. EPA/630/R-95-002F;

Ecological Risk Assessment Guidance for Superfund, Process for Designing and Conducting Ecological Risk Assessments. June 1997. EPA/540-R-97-006;

Ecological Assessment of Hazardous Waste Sites: A Field and Laboratory Reference Document. EPA 600/3-89/013. March 1989;

EcoUpdate: Intermittent Bulletins, Supplemental Guidance to RAGS, Vol. II. EPA Publications 9345.0-051. The contractor shall perform the following tasks which will result in technical analysis, findings, facts, and options to the COR responsible for human health and ecological risk assessments.

C. DATA MANAGEMENT SUPPORT

The contractor shall:

- 1. provide information technology analysis and options
- 2. provide information technology support, for example web page support
- 3. provide data input/output services

D. QUALITY ASSURANCE REQUIREMENTS

When performing work under this SOW, the contractor shall adhere to the following Quality Assurance references and to all requirements/guidance documents incorporated by reference therein.

The contractor shall evaluate the usability of the data. This will include any uncertainties associated with the data. Where appropriate, the contractor shall perform a data quality assessment in accordance with Guidance for Data Quality Assessment, EPA/600/R-96/084, July 1996 or most recent version (http://www.epa.gov/superfnd/oerr/aoc/download/epaqag9.pdf) and EPA Region II specific Data Validation Standard Operating Procedures which are available for download at http://clu-in.com/download/rcrasup/.

A. Preparation of Generic Project Plans for any Site Investigations Activity

Site Investigation Activities include: Preliminary Assessments (PAs), Site Inspections (SIs), Site Inspection Prioritizations (SIPs), Expanded Site Inspections (ESIs) and Integrated Assessments (IAs).

The contractor shall prepare draft and final versions of the generic project plans for Health and Safety Plan (HASP) and Field Sampling Plan (FSP).

The purpose of preparing these generic plans is to minimize the time and paper work required to prepare the site-specific plans for Site Investigation activities. When directed in writing by the EPA,

the contractor shall prepare a simplified Preliminary Findings and Sampling Plan (PFSP) which must include the site-specific portions of the plans to be prepared for each site assignment. These generic plans must document the task activities, field investigation and sampling procedures; and the guidelines, requirements and procedures for health protection, which are applicable to each site assigned. These generic plans must also provide guidelines for gathering and developing the site-specific data and information for a given site, in order to make these project generic plans become site-specific plans. The contractor shall summarize the required site-specific data and information be summarized in the PFSP.

The Generic FSP must include: sampling and decontamination procedures and guidelines for conducting onsite reconnaissance, determining sample numbers and locations, and specifying QA/QC sample requirements.

The Generic HASP must include: the guidelines, requirements and procedures for health protection.

a. Generic Health and Safety Plan

The Contractor shall develop a generic plan for all Site Investigation activities in order to simplify the preparation, and to minimize the volume of the site specific Health and Safety Plan for each site assigned for any site investigation activity. The Generic Health and Safety Plan must consist of generic and site specific sections (see Attachment I). The generic sections contain the guidelines, requirements and procedures which are applicable to each of the sites assigned. The site-specific sections must specify the site-related data and information requirements in order to make the Generic Health and Safety Plan become a complete site Health and Safety Plan. Therefore, with the supplement of the Generic Health and Safety Plan, the Health and Safety Plan for a given site assignment will only require the preparation and addition of the site specific sections (see Attachment 1) of the generic plan.

For each site assignment, the Contractor shall prepare a Task Work Plan and incorporate it into a Preliminary Findings and Sampling Plan. The contents of this Task Work Plan must include site description, site history and contamination, Site Location Map, Site Sketch Map, Previous Work at the Site, Site Reconnaissance Objectives, Sampling Trip Objective (including Technical Approach - Logistics and Team Organization, Sampling Strategy, Decontamination, Documentation, sampling efforts, documentation requirements (Sample Rationale, Analytical Parameter and Site Sampling Plan Map) and a Site Safety Plan. The Task Work Plan (including the Site Safety Plan) must address the data and information requirements of the site-specific sections (see Attachment 1) for a given site assignment. The Contractor shall address some of the site-specific sections (i.e., Items 6, 14, 15, 16, 17 and 18) in the Task Work Plan, and the other sections (i.e., Items 1, 3, 7, 8, 21, 24, 31, 27, 38, 39, 42, 43, and 44) will be addressed in the Site Safety Plan. In short, the Health and Safety Plan for a given site assignment must consist of the Generic Health and Safety Plan and the Task Work Plan (including the Site Safety Plan).

b. Generic Field Sampling Plan

The contractor shall develop a Generic Field Sampling Plan (FSP), which will be applied as a generic document for all field operations undertaken by the contractor for any site investigation activity. This document must be developed in accordance with USEPA Region II Quality Assurance Manual, and is intended to be utilized in conjunction with the site-specific Task Work Plan for a given site.

The intent of Site Investigations is to provide a preliminary screening approach to facilitate USEPA assignment of site priorities with the objective to determine the potential of a site for its inclusion on the National Priorities List (NPL). These activities will focus on determining USEPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) eligibility, documenting the presence or absence of hazardous substances, and collecting area receptor and site characteristics information. The sample strategy listed with this document must emphasize the collection of samples required to evaluate certain pathways of concern to the CERCLA program. The FSP must include, as sections, discussion of the objectives of the initial site reconnaissance, sampling visit and sampling procedures by matrix, Quality Assurance/Quality Control (QA/QC) specifications, and Field Change and Corrective Actions. The following outline must be used to develop this document.

- 1. Introduction
- 2. Site Reconnaissance
- **3.** Sampling Visit and Sampling Procedures

3.1 Sample Tracking System
Sample Identification System
Sample Bottles
Sample Packaging and Shipping
Sample Documentation

3.2 Sampling Program
Surface Soil Sampling
On-Site Monitoring Well Sampling
Water Supply Well Sampling
Surface Water Sampling
Sediment Sampling

3.3 Stream Water Flow Measurement

3.4 Decontamination

- 4. Quality Assurance/Quality Control
 - **4.1** Field Instrument Calibration and Preventive Maintenance
 - **4.2** QA/QC Sample Collection

Trip Blanks
Field Blanks
Deionized Water Blanks
Duplicate Samples
Split Samples
Background Samples
Data Validation

5. Field Changes and Corrective Actions

c. Task Work Plan (TWP)

A TWP template is provided by EPA (See Attachment 2). This plan contains the site specific information generally required by a WP, a FSP, and a HASP but in a brief form. The contractor shall use a site TWP in conjunction with the generic WP, FSP and HASP developed for any Site Investigation to become, respectively, the site-specific WP, FSP and HASP. As presented in Attachment 2, this TWP must include descriptions of the site and hazardous waste contamination, sampling strategy (Part two of the Background/Sample Strategy Form), description of site activities and team responsibilities, onsite reconnaissance checklist, Sample Summary Form, and Site Safety Plan.

d. Preliminary Findings and Sampling Plan (PFSP)

The contractor shall submit a Preliminary Findings and Sampling Plan (or site-specific plan) for any site investigation where sampling is recommended. The PFSP must provide a justification for the proposed sampling event and include the following sections:

- 1. General Description and Site History
- 2. Site Location Map
- 3. Site Sketch Map
- 4. Evaluation of Existing Information
- 5. Hazard Assessment
- **6.** Source Description
- 7. Groundwater Pathway

- **8.** Surface Water Pathway
- **9.** Soil Exposure Pathway
- **10.** Air Pathway
- 11. Sensitivity Analysis
- 12. Summary and Conclusion
- 13. Prescore
- 14. Task Work Plan for Sampling Visit

A two week review of the draft PFSP is required for EPA. The contractor should receive EPA's comments (specifically, comments on the onsite reconnaissance checklist) at the end of the review period or before the onsite reconnaissance taking place. These plans must be finalized according to EPA's comments and the results of the onsite reconnaissance. The contractor shall submit the final PFSP to EPA one week after the onsite reconnaissance for review and approval. These final plans should be approved by EPA at least one week prior to the date for the sampling visit.

2. Preparation of Generic Brownfield Field Sampling Plan (BFSP) for Brownfield Site Investigations (BSI) - The BSI is a streamlined site investigation used to adequately characterize site conditions, however, these investigations will not involve collection of data associated with Hazard Ranking System (HRS) preparation. These investigations will be at sites selected by EPA Region II and must be conducted in compliance with EPA and State requirements, (e.g., New Jersey Technical Requirements for Site Remediation).

The contractor shall prepare draft and final versions of the generic project plans for the Health and Safety Plan (HASP) and Field Sampling Plan (FSP) for Brownfield Site Investigations. The contractor shall prepare these generic plans in compliance with "Region II Brownfields Generic QAPP" and follow the formats provided in "1. Preparation of Generic Plans for Site Investigation Activity" eliminating any reference to data associated with HRS package preparation.

The purpose of preparing these generic plans is to minimize the time and paperwork required to prepare site-specific plans for Brownfield Site Investigation activities. When directed in writing by EPA, the contractor shall prepare a simplified BFSP, which must include the site specific portions of the plans, for each site assignment. These generic plans must document the task activities, field investigation and sampling procedures, and guidelines, requirements and procedures for health protection which are applicable to each site assigned. These generic plans will provide guidelines for gathering and developing the site-specific data and information for a given site in order to make these project generic plans become site-specific plans. The required site-specific data and information must be summarized in the BFSP.

<u>Generic BFSP:</u> must include sampling and decontamination procedures and guidelines for conducting onsite reconnaissance, determining sampling numbers and locations, and specifying

QA/QC sample requirements.

Generic HASP: must include the guidelines, requirements and procedures for health protection.

<u>Site-specific BFSP:</u> shall be submitted by the contractor for any BSI where sampling is recommend. The BFSP must detail sampling needed to determine the nature, extent, source, and significance of contamination present at the site, and shall include all the sampling and analysis necessary to determine **redevelopment** cleanup alternatives and costs of implementing those cleanup alternatives to meet the redevelopment options identified by EPA. The contractor shall conduct sampling with an emphasis on field screening sampling techniques and innovative technologies.

ATTACHMENT I

GENERIC AND SITE-SPECIFIC PORTIONS OF A HEALTH AND SAFETY PLAN FOR SCREENING SITE INSPECTIONS

ITEM	HEALTH AND SAFETY PLAN CONTENTS	GENERIC	SITE SPECIFIC
1	COVER PAGE		X
2	TABLE OF CONTENTS	X	
3	SECTION I: APPROVALS		X
4	SECTION II: GENERAL	X	
5	2.0 Introduction	X	
6	2.1 Proposed Site Activities		X
7	2.2 Emergency Phone Number		X
8	2.3 Contractor Contacts		X
9	SECTION III: HEALTH AND SAFETY PERSONNEL	X	
10	3.0 Health and Safety Personnel Responsibilities	X	
11	3.1 SI, SIP, ESI or IA Manager	X	
12	3.2 Company Health and Safety Supervisor (CHSS)	X	
13	3.3 Health and Safety Officer (HSO)	X	
14	3.4 Designated HSO	X	
15	SECTION IV: SITE HISTORY AND PHYSICAL DESCRIPTION		X
16	4.0 Location		X
17	4.1 Description		X
18	4.2 History		X

19	SECTION V: SITE RELATED INCIDENTS, COMPLAINTS AND ACTIONS		X
20	SECTION VI: CHEMICAL CONTAMINANTS DATA	X	
21	6.0 Introduction	X	
22	6.1 Chemical Data Sheet		X
23	6.2 Characteristics	X	
24	6.3 Sources	X	
25	SECTION VII: HAZARD ASSESSMENT		X
26	SECTION VIII: TRAINING AND MEDICAL REQUIREMENTS	X	
27	SECTION IX: ZONES, PERSONAL PROTECTION AND COMMUNICATION	X	
28	9.0 Site Zones	X	
29	9.1 Exclusion Zones	X	
30	9.2 Contamination Reduction Zone	X	
31	9.3 Support Zone	X	
32	9.4 Personal Protection		X
33	9.5 Communications	X	
34	SECTION X: MONITORING PROCEDURES	X	
35	SECTION XI: SAFETY CONSIDERATIONS	X	
36	SECTION XII: STANDARD SAFE WORK PRACTICES	X	
37	SECTION XIII: DECONTAMINATION PROCEDURES	X	
38	SECTION XV: EMERGENCY PLAN		X
39	SECTION XVI: MEDICAL DATA SHEET/FIELD TEAM REVIEW		X*
40	APPENDIX A: CHEMICAL DATA SHEETS		X*

41	APPENDIX B: INCIDENT REPORT	X*
42	APPENDIX C: OSHA POSTER	X*
43	APPENDIX D: H&S WEEKLY REPORT	X*

^{*} The information required in these sections are site-specific. However, the forms used in these sections are uniformly applicable to each site assessment. Therefore, these forms are included in the Generic Health and Safety Plan.

ATTACHMENTS II and III are guidance documents.